

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Crystal P. Clark**

Debtor(s)

Case No. **17-10796**
Chapter **13**

DEBTOR, CRYSTAL P. CLARK'S, RESPONSE AND OPPOSITION TO
MOTION OF SANTANDER BANK, N.A. FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted.

7. Denied. It is denied that debtor owed the amount stated by Movant, for the monthsw of July 2017 through January 2018, it is also denied that late charges, additional attorneys' fees and costs are necessarily due by debtor.

8. Admitted.

9. Denied. Debtor is uncertain as to the exact indebtedness to Santander and therefore this averment is denied.

10.. Debtor has acted in good faith in making post-petition mortgage payments, she is employed and wants to keep her house. Debtor may enter a Stipulation for any post-petition payments that may be owing if all parties hereto can reach agreement.

WHEREFORE, Respondent, debtor, respectfully requests that this Honorable Court DenySantander Bank's Motion for Relief.

By: /s/Tova Weiss
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February 22, 2018